

**Todd, Gordon D.**

---

**From:** Jorgensen, Jay T.  
**Sent:** Wednesday, May 20, 2009 8:53 PM  
**To:** 'Louis Bullock'  
**Cc:** 'George, Robert'; 'James Graves'  
**Subject:** Motion to compel and motion for protective order

Louis,

Thanks for talking with me today. To confirm, you said that plaintiffs and their experts have not submitted any other articles or peer review materials other than those that have previously been disclosed. Defendants believe that, as a result, the parties should withdraw the pending motions to compel and for a protective order until the dispute is more ripe. You noted on the call that plaintiffs may submit materials for peer review in the future, and therefore declined to withdraw your motion for a protective order.

I appreciate you taking the time to confer on this.

Jay

Jay T. Jorgensen  
Sidley Austin LLP  
1501 K Street, NW  
Washington, DC 20005  
202-736-8020  
202-736-8711 (fax)  
jjjorgensen@sidley.com